

**REMARKS**

This is a full and timely response to the Office Action mailed December 16, 2004.

By this Amendment, claims 1-4 have been rewritten as new claims 5-8 to put the claims in better form under U.S. practice. Support for the new claims can be found throughout the specification and the original claims. Claims 5-8 are pending in this application.

In view of these amendments, Applicant believes that the pending claims are in condition for allowance. Reexamination and reconsideration in light of the above amendments and the following remarks is respectfully requested.

**Rejection under 35 U.S.C. §112**

Claims 1-4 are rejected under 35 U.S.C. §112, second paragraph, as allegedly being indefinite. Applicant respectfully traverses this rejection.

However, in the interest of expediting the prosecution of the present application, Applicant has rewritten the claims to address the Examiner's concerns. Specifically, the new claims positively recite a method step and are complete as to the inventive subject matter. Hence, no essential steps have been omitted from the claimed method.

Thus, in view of the new claims, withdrawal of this rejection is respectfully requested.

**Rejection under 35 U.S.C. §103**

Claims 1-4 are rejected under 35 U.S.C. §103(a) as allegedly being obvious over Wickwire Jr. (U.S. Patent 2,338,558) in view of Crounse (U.S. Patent Publication 2004/0130753). Applicant respectfully traverses this rejection.

To establish a *prima facie* case of obviousness, the cited references, in combination, must teach or suggest the invention as a whole, including all the limitations of the claims. Here, in this case, the combined teachings of Wickwire Jr. and Crounse do not teach or suggest the claimed limitation "*printing a plurality of colors to be overlapped by an application of a plurality of printing rolls*".

Wickwire Jr. only teaches an improved intaglio cylinder and method of making thereof, and Crounse only relates to methods of using hybrid AM/FM screening in *flexographic, xerographic, inkjet, and offset printing processes* (see paragraphs [0002] and [0061] of Crounse). Hence, since the teachings of Wickwire Jr. and Crounse do not at all relate to a

gravure printing method, the cited references cannot possibly teach or suggest the method step of “*printing a plurality of colors to be overlapped by an application of a plurality of printing rolls*”.

Further, an obviousness rejection can only be established if there is some teaching, suggestion, or motivation found in the references or in the art to combine or modify the cited references. If the teachings of the cited references conflict, such conflict is evidence that the cited references cannot be combined or modified. In particular, if a proposed modification would render the prior art invention unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984). Since the disclosures of Wickwire Jr.’s and Crounse are directed to different printing process (i.e. *gravure printing* versus *flexographic, xerographic, inkjet, and offset printing*), there can be no suggestion or motivation, in either of the cited references, to modify or combine the reference teachings. In other words, the improved intaglio cylinder in Wickwire Jr. cannot be used in the *flexographic, xerographic, inkjet, and offset printing processes* (with hybrid AM/FM screening) of Crounse. It is clear that such a modification to Crounse would render the prior art invention (for example, the print engine or print head) unsatisfactory for flexographic, xerographic, inkjet, and offset printing.

It should also be noted that FM screen technology has not been applied to gravure printing since in such a printing process, ink is deposited into the cells by a doctor blade but a screen line has not been provided for scraping off surplus ink (see page 3 of the specification). Thus, it was unknown prior to the present invention whether FM screen technology can be applied to gravure printing. As the Examiner knows, in establishing a *prima facie* case of obviousness, there must also be a reasonable expectation of success. Since success cannot be reasonably expected based on the teachings of the Wickwire Jr. and Crounse, a *prima facie* case of obviousness cannot be made.

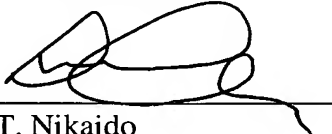
Thus, for these reasons, withdrawal of this rejection is respectfully requested.

**CONCLUSION**

For the foregoing reasons, all of the claims now pending in the present application are believed to be clearly patentable over the outstanding rejection. Accordingly, favorable reconsideration of the claims in light of the above remarks is courteously solicited. If the Examiner has any comments or suggestions that could place this application in even better form, the Examiner is requested to telephone the undersigned attorney at the below-listed number.

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Respectfully submitted,

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